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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:	:	Chapter 11
	:	
	:	Case No. 09-50026 (REG)
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	
	:	Jointly Administered
	:	
Debtors.	:	
_____	x	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Neil S. Binder of the law firm Richards Kibbe & Orbe LLP, hereby appears in the above-captioned case on behalf of Morgan Stanley & Co. International plc ("Morgan Stanley Int'l"); and that such party requests that his name be added to the mailing list maintained in the above-captioned case, and that all notices given and all papers served on any party, filed with the Court or delivered to the Office of the United States Trustee in the above-captioned case be delivered to and served upon them as Counsel to Morgan Stanley Int'l, at the following addresses, respectively:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010 of the Federal Rules of Bankruptcy Procedure, the foregoing request includes not only the notices and papers referenced in the Bankruptcy Rules, Bankruptcy Code and Local Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, demands, hearings, requests, complaints, monthly operating reports, cash-flow reports, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to cases and any proceeding therein, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise in this case.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit waives (1) Morgan Stanley Int'l's right to have final orders in non-core matters entered only after de novo review by a United States District Court Judge; (2) Morgan Stanley Int'l's right to a jury trial; (3) Morgan Stanley Int'l's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Morgan Stanley Int'l is or may be entitled under agreements, in law or equity, all of which rights, claims actions, defenses, setoffs, and recoupments Morgan Stanley Int'l expressly reserves.

Dated: New York, New York  
December 17, 2010

RICHARDS KIBBE & ORBE LLP

/s/ Neil S. Binder

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Neil S. Binder

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